

**RKW, LLC**

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*Attorneys for Defendant  
eMerges.com Inc.*

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

ATLAS DATA PRIVACY CORPORATION \*  
*As assignee of individuals who are Covered*  
*Persons, JANE DOE-1, a law enforcement* \*  
*Officer; JANE DOE-2, a law enforcement*  
*Officer; EDWIN MALDONADO SCOTT* \*  
MALONEY, JUSTYNA MALONEY,  
PATRICK COLLIGAN, PETER \*  
ANDREYEV, and WILLIAM SULLIVAN \*

Civil Action No. 2:24-cv-04434

Plaintiffs,

v.

E-MERGES.COM INC., RICHARD ROES \*  
*1-10, fictitious names of unknown individuals* \*  
*And ABC COMPANIES 1-10, fictitious*  
*Names of unknown entities* \*

\* \* \* \* \*

**APPLICATION FOR EXTENSION OF TIME TO**  
**ANSWER, MOVE, OR OTHERWISE REPLY**  
**PURSUANT TO LOCAL CIVIL RULE 6.1(B)**

Application is hereby made for a Clerk's Order extending the time within which  
defendant eMerges.Com, Inc. may answer, move, or otherwise reply to the complaint. It is  
hereby represented that:

1. No previous extension has been requested or obtained;

2. Plaintiffs filed their complaint in the Superior Court of New Jersey, Bergen County on February 20, 2024.
3. On March 2, 2024, Plaintiffs delivered the complaint to EMerges.Com, Inc.'s registered agent in Maryland;
4. eMerges.Com, Inc. removed this action to this Court on April 1, 2024.
5. Pursuant to Federal Rule of Civil Procedure 81(c)(2)(C), eMerges.Com, Inc.'s time to answer, move, or otherwise reply is April 8, 2024.
6. Fourteen (14) days from April 8, 2024, is April 22, 2024.

Dated: April 2, 2024

Respectfully submitted,

**RKW, LLC**

By: /s/ Stacey Torres  
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*Attorneys for Defendant  
eMerges.com Inc.*

### **CERTIFICATE OF SERVICE**

I hereby certify that on this 2<sup>nd</sup> day of April, 2024, a copy of the foregoing Application for Extension of Time was served on counsel of record via the Court's ECF system and sent via email to the following counsel: Rajiv Parikh <[rparikh@pemplawfirm.com](mailto:rparikh@pemplawfirm.com)>; Kathleen Barnett Einhorn <[keinhorn@pemplawfirm.com](mailto:keinhorn@pemplawfirm.com)>; Ryan McGee x3030 <[rmcgee@forthepeople.com](mailto:rmcgee@forthepeople.com)>; John Yanchunis x2191 <[JYanchunis@forthepeople.com](mailto:JYanchunis@forthepeople.com)>; Melissa Hill x28447 <[melissahill@ForThePeople.com](mailto:melissahill@ForThePeople.com)>

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